

Honorable Franklin D. Burgess

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

LAM RESEARCH CORPORATION, a
Delaware corporation,

Plaintiff,

VS.

SUBHASH DESHMUKH, a Washington resident,

Defendant.

Cause No. CV4-5435FDB

**STIPULATION TO STAY DISCOVERY IN
ORDER TO ENGAGE IN MEDIATION
AND TO EXTEND DISCOVERY DATES
AND PROPOSED ORDER GRANTING
STIPULATION**

**NOTE FOR MOTION CALENDAR:
October 18, 2005**

I. MOTION

Plaintiff Lam Research Corporation and Defendant Subhash Deshmukh, pursuant to Local Rule CR 7(d)(1), move for an order (1) staying discovery for a period of two weeks (October 14, 2005 – October 28, 2005) and (2) extending the expert witness objections date to November 10, 2005 and the discovery cutoff date to November 22, 2005. The November 22, 2005 date, although being slightly longer than the stay period is necessary so as to accommodate each party's expert witness schedule with respect to expert witness depositions. The stay applies to all discovery excluding (1) a presently filed motion in the United States District Court for the

**STIPULATION AND ORDER FOR STAY AND EXTENSION OF
DISCOVERY- 1
(CV4-5435FDB)**

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1 Northern District of California seeking an order to compel Applied Materials, Inc. to produce
2 certain documents requested pursuant to subpoena and (2) an outstanding subpoena to third party
3 Fujitsu Microelectronics America, Inc.

4 Good cause exists for the above requested stay and extension in that the stay is requested
5 in order for the parties to engage in mediation of this matter. As the Court is aware, this lawsuit
6 has been vigorously contested by both parties, and a stay of discovery in an effort to resolve this
7 case may assist the parties in achieving resolution.

8 Neither party intends this extension to have any impact upon the impending trial date
9 identified in the Court's Initial Minute Order Scheduling Court Trial and Pretrial Dates.

10 Stipulated to this ____ day of _____ 2005.
11

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13 HOLLAND & KNIGHT LLP
14

15 By: _____
16 Alexander A. Baehr, WSBA No. 25230
17 Attorneys for Plaintiff
18

19 CORR, CRONIN, MICHELSON,
20 BAUMGARDNER & PREECE, LLP
21

22 By: _____
23 Kelly P. Corr, WSBA No. 00555
24 Kelsey Joyce, WSBA No. 29280
25
26

ORDER

Pursuant to Local Rule CR 10(g), it is so ORDERED.

Entered this 21st day of October 2005.


FRANKLIN D. BURGESS
UNITED STATES DISTRICT JUDGE

Presented by:

HOLLAND & KNIGHT LLP

Alexander A. Baehr, WSBA No. 25320
Attorneys for Plaintiff.

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**STIPULATION AND ORDER FOR STAY AND EXTENSION OF
DISCOVERY- 3
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